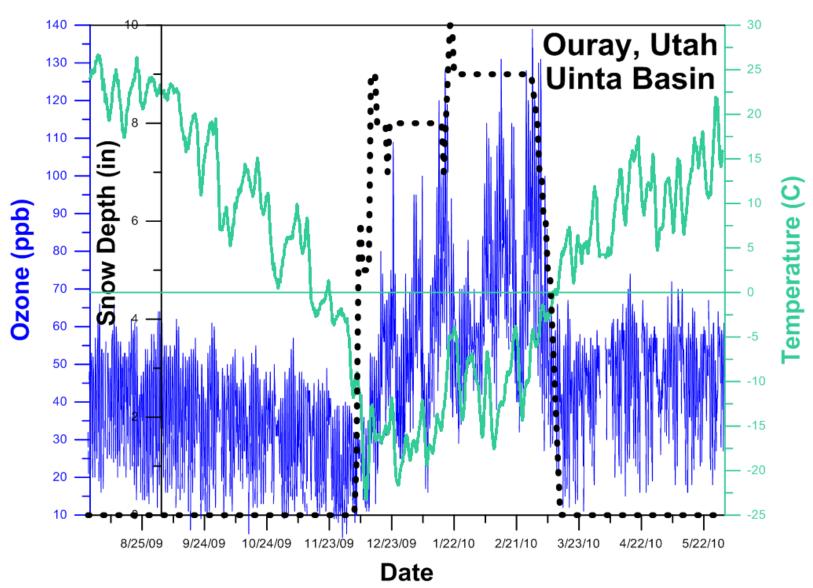


Uintah Basin Winter Ozone

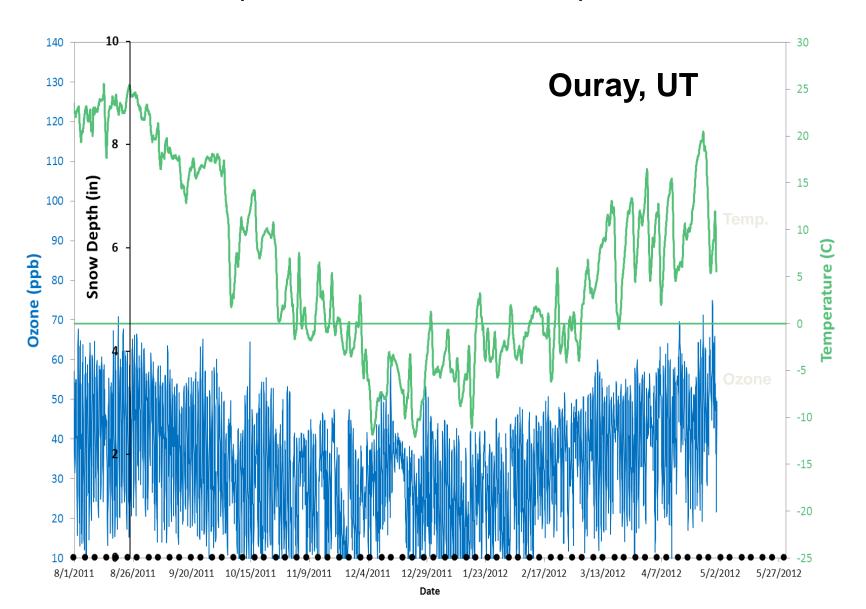
- Monitoring in the Basin since 2009
- High ozone during winter unique
- Episodic with specific weather conditions
- High year-to-year variability
- Currently designated "unclassifiable"
- Special winter ozone studies past 3 winters
- Apply findings to mitigation Ozone Advance

Ozone, Temperature and Snow Depth 2010/2011

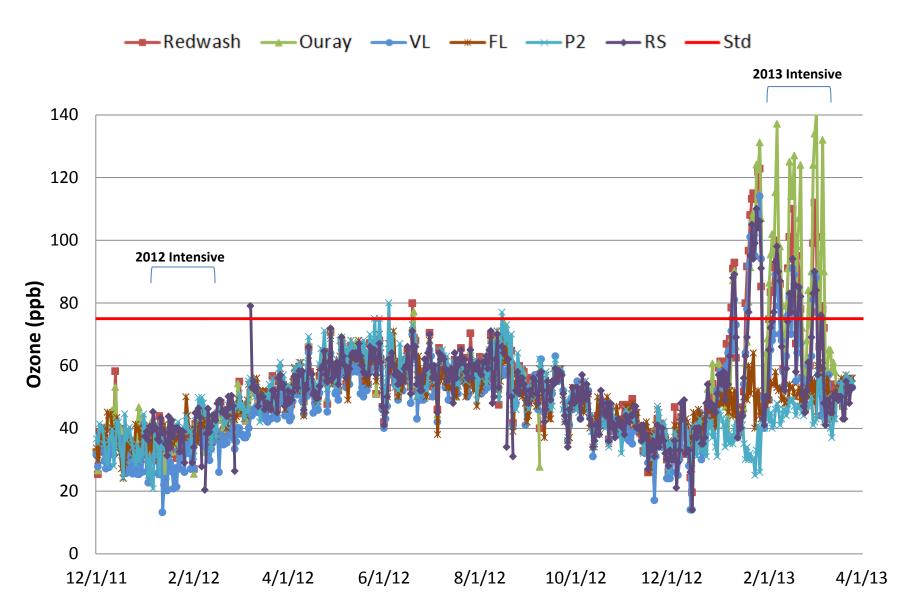


Source: Russ Schnell, Director, Observatory Operations, NOAA/CMDL

Ozone, Temperature and Snow Depth 2011/2012

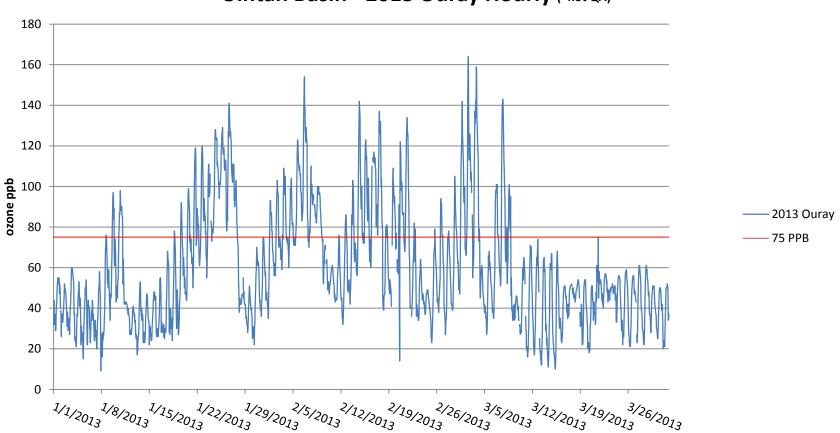


Ozone Concentration, 8-hr



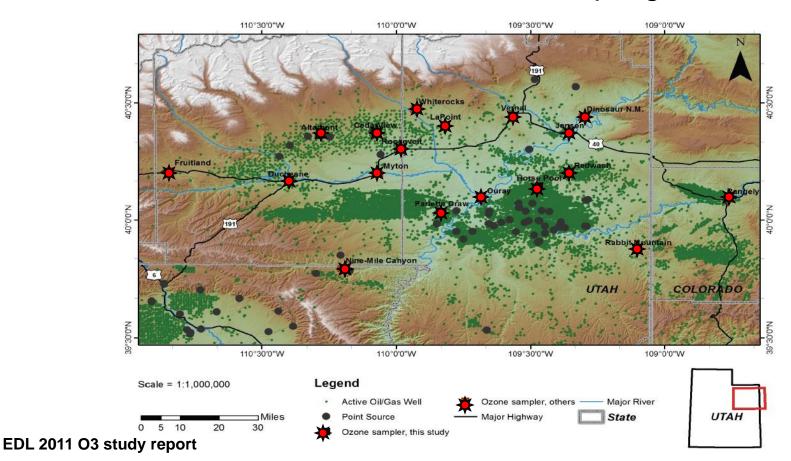
Distinct Winter Events, Episodic

Uintah Basin - 2013 Ouray Hourly (*not QA)



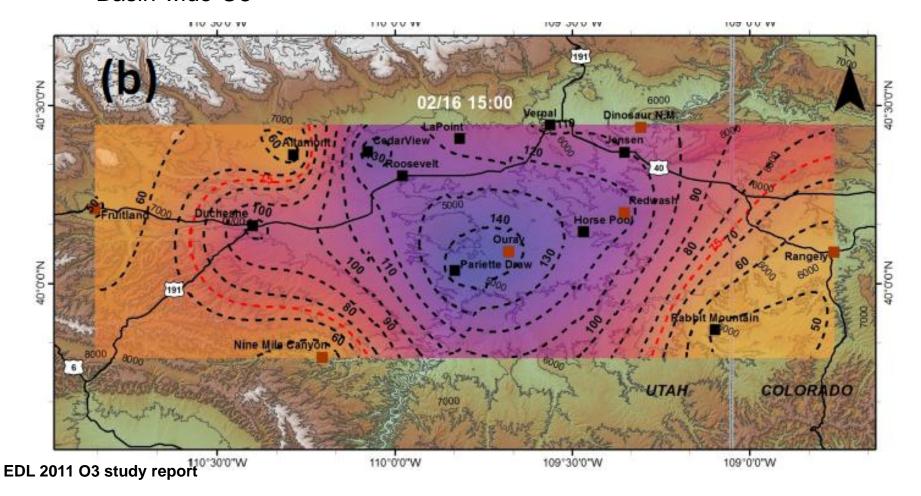
Special Winter Ozone Monitoring Studies 10/11, 11/12, 12/13

- 8 permanent and 10 portable sites
- O3, PM2.5, NOx and Met, VOC sampling



USU/EDL Special Monitoring Study Winter 2010/2011

- Ozone 1-hour at 3 pm Feb 16, 2011
- Basin-wide O3



Horse Pool Super Site Installation of scaffold tower and monitoring pod



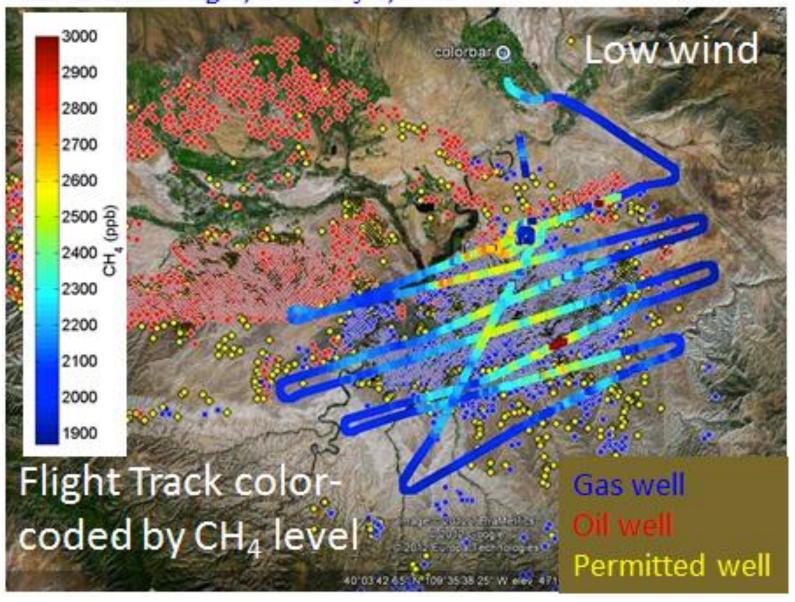
Horse Pool Super Site Monitoring equipment in monitoring pod



Winter O3 Intensive Study Components

- Aircraft Basin—wide Measurements: O3, NOX and Speciated VOC
- Vertical Profiling of Meteorological Parameters, O3, NOx, and Total Hydrocarbons using Tethered Balloon
- Wintertime Ozone Formation Chemistry at Horse Pool
- Atmospheric Boundary Layer and Recirculation Characterization Basin-wide
- Long-Term Trends Wintertime Monitoring for Ozone, and Key Precursor Species – Roosevelt and Horse Pool "Super Sites"
- Photochemical Modeling of the Basin's Airshed

Uintah Basin Flight, February 7, 2012



Summary

- Issue with winter ozone in the Basin
- Only occurs under specific conditions
- Cooperative effort to understand formation
- Let science lead the strategies
- Proactive effort through Ozone Advance
- Avoid nonattainment / lower design value

Early Reductions Will Benefit Uintah Basin

- Improve public health
- More time to solve the problem
- Reduce the design value for the SIP
 - The CAA requires areas to be designated based on the severity of the problem
 - Areas closer to the standard have fewer mandatory requirements, but must attain the standard more quickly
 - If an area does not attain the standard it is bumped up to the next higher classification level
- Potential Cost Savings for Companies
 - Make reductions over time rather than all at once
 - Ability to include future costs in long-term business plan
 - Greater ability to control emission reduction strategy
- Ability to use voluntary measures and strategies that are more difficult to quantify
- Episodic reductions could be effective

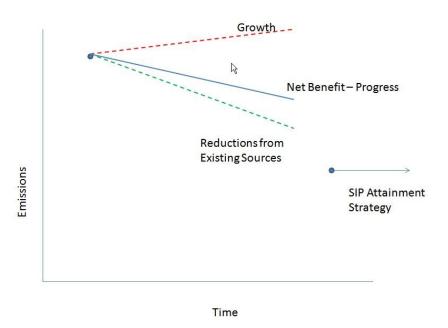
Ozone Advance Program



- Ozone Advance is a voluntary EPA program to facilitate early reductions of ozone before an area is designated nonattainment
 - Flexible, not a burdensome process
 - Stakeholder involvement
 - Opportunity for voluntary or non-regulatory measures
 - Opportunity to quantify and recognize early reductions
 - EPA support for the process
 - Opportunity to affect the design value and progress under this program may be a factor in timing of redesignations under current standard
 - No guarantees or regulatory relief
- On May 21, 2012 Governor Herbert submitted an application to EPA to enroll Duchesne and Uintah Counties in the program
- On June 4, 2012 EPA accepted Utah into the Ozone Advance Program

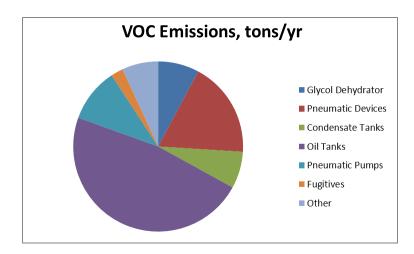
Permitting

- Ensure that new sources are well controlled
 - BACT, NSPS, NESHAP
 - Avoid need for future retrofits
- New source growth must not cause or contribute to a violation of the NAAQS
 - Attainment areas rely upon modeling and monitoring data
 - This approach is more difficult in the Basin
 - High ozone values
 - Significant growth in production
 - Options available
 - Modeling
 - Offsets
 - Other justifiable approach
 - Working on a broader analysis to make this demonstration



Initial Strategies

Oil and Gas Emissions, Duchesne and Uintah Counties



Source: WRAP Phase III Inventory, 2012 projections

- Pollution prevention
 - Pneumatic devices
 - Best management practices
- Ensure existing equipment is operating as intended
 - General provisions
 - Submerged filling
- Episodic control plans
- Retrofits of oil and condensate tanks

General Approval Order

- Typical oil or gas wellhead site
 - Required emission control equipment and emission limits
 - Appropriate de minimus level
 - What makes sense for specific equipment
 - May result in recommended rule change
 - When is case-by-case review required?
 - Compatible with existing permitting system for Division of Oil Gas and Mining
- Consider strategies for retrofitting existing equipment

Stakeholder Meetings

- July 30, 2013, DEQ Board Room, 3-5
 - Overview of ozone in the Basin
 - Strategies: pollution prevention, best management practices, general provisions, episodic controls
- August 12, DEQ Board Room, 3-5
 - General permit, de minimus levels, potential retrofits for well sites
- Early Fall (date TBD)
 - General permit, de minimus levels, potential retrofits for well sites
- Future public meetings will be scheduled focused on specific topics